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Huntington, Utah 84528

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DIVISION OF
OIL, GAS AND MINING

May 30, 2000

Utah Coal Program
Utah Division of Oil, Gas, and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Attn: Pam Grubaugh-Littig: Permit Supervisor, SLC
Bill Malencik: Reclamation Specialist, PFO

Re: * Amendment to Cottonwood/Wilberg Mine Permit to Revise the Introduction Section (includes Table of Contents) and replace Cottonwood Mine Waste Rock Storage Facility binder with Cottonwood Mine: Volume 10 Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027, PacifiCorp, Cottonwood/Wilberg Mine, ACT/015/019, Emery County Utah *AM00D*

* Response to Deficiencies Listed in Letter Dated April 18, 2000, AM00B (Cottonwood/Wilberg Mine Earthwork Calculation Extension Request)

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits an amendment revising the Introduction Section (includes the Table of Contents). In addition, Energy West hereby submits a new binder entitled "Cottonwood Mine: Volume 10 Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027" to replace the binder entitled "Cottonwood Mine Waste Rock Storage Facility". It was apparent during a recent review (see letter dated April 18, 2000, "Findings for Reclamation Plan, AM00B") that confusion exists pertaining to the location of environmental data concerning the Cottonwood Mine waste rock sites. Cottonwood Mine has two permitted waste rock sites referred to as Bureau of Land Management (BLM) right-of-ways UTU-37642 and UTU-65027. The following is brief history of each right-of-way and the location of environmental resource data:

BLM Right-of-Way UTU-37642 (Old Waste Rock Site):

ENVIRONMENTAL RESOURCE LOCATED IN APPENDIX VII

(Revised and submitted on January 11, 2000, no correspondence has been received from the Division on this amendment)

Huntington Office:
(435) 687-9821

Fax (435) 687-2695

Purchasing Fax (435) 687-9092

Deer Creek Mine:

(435) 687-2317

Fax (435) 687-2285

Trail Mountain Mine:

(435) 748-2140

Fax (435) 748-5125

Old Waste Site: Located 1.5 miles south of the Cottonwood/Wilberg Mine, this 48.62 acre site was originally designed as an open storage and truck loadout for the Cottonwood/Wilberg Mine. The right-of-way grant was issued by the BLM in 1977 but subsequent developments, specifically a concrete storage silo for coal storage constructed at the mine site, changed the need for this site. A modification was submitted to use this land for underground development waste storage in connection with underground development ongoing in the Cottonwood/Wilberg Mine. Right-of-Way UTU-37642 has been modified to accommodate coal bed methane degasification conducted by Texaco Inc. Listed below is a list of the acreage descriptions of the right-of-way including original grant, modifications, and disturbance associated with the facility:

BLM Right-of-Way UTU-37642

Original Grant	48.62 acres
1997 Relinquishment (Texaco Well 35-14)	1.08 acres
1999 Relinquishment (Texaco Well 34-80)	12.98 acres
TOTAL RIGHT-OF-WAY UTU-37642	34.56 acres
Disturbed Area	15.62 acres
Reclaimed Area (Phase I Released)	13.81 acres

Approximately 13.81 acres of the old waste rock site has been reclaimed. Material to cover the waste rock was taken from the perimeter berms. Phase 1 bond release was approved on July 22, 1999. The area relinquished in 1999, (12.98 acres approved by the BLM on November 2, 1999) was undisturbed acreage located mainly on the west side of State Highway 57.

BLM Right-of-Way UTU-65027 (New Waste Rock Site):

ENVIRONMENTAL RESOURCE LOCATED IN COTTONWOOD MINE: VOLUME 10, PREVIOUSLY REFERRED TO AS "COTTONWOOD COAL MINE: WASTE ROCK STORAGE FACILITY"

New Waste Site: Located 1.7 miles south of the Cottonwood/Wilberg Mine on the west side of State Highway 57 is BLM Right-of-Way UTU-65027. This 27.27 acre site was permitted to replace the "Old Waste Rock Site: BLM Right-of-Way UTU-37642" which reached designed capacity. The Right-of-Way grant was issued by the BLM on

June 8, 1990. Right-of-Way UTU-65027 has been modified to accommodate coal bed methane degasification conducted by Texaco Inc. and to reflect as-built conditions (approved by the BLM on January 7, 2000, submitted as amendment to Cottonwood MRP on January 11, 2000). Listed below is a list the acreage descriptions of the Right-of-Way including original grant, modifications and disturbance associated with the facility:

BLM Right-of-Way UTU-65027

Original Grant: 6/8/90	25.49 acres
Amendment: 8/15/90 (Staging Area)	1.78 acres
Subtotal	27.27 acres
1999 Relinquishment (Texaco Well 34-80)	
Staging Area	1.78 acres
As-Built Addition (1999)	0.36 acres
TOTAL RIGHT-OF-WAY UTU-65027	25.85 acres
Disturbed Area (Total Project Life)	17.44 acres

During the Texaco well assessment, PacifiCorp re-surveyed the disturbed and permit boundaries associated the right-of-way UTU-65027. Two small areas of disturbance were located outside the original metes and bounds permit boundary description. To rectify this situation, PacifiCorp has revised the right-of-way description to include all areas of disturbance associated with the waste rock site (refer to amendment submitted on January 11, 2000). The 1999 relinquished area referred to as the "staging area", was previously disturbed by oil and gas drilling activities in 1956. PacifiCorp will retain access to State Highway 57 and has installed permit and disturbed boundary signs as indicated on map 4-1 (CM-10826).

The following items listed reflect the changes and revisions to the Cottonwood MRP:

Volume 1, Introduction:

Replace entire section (reformatted and updated):

- 1 redline copy provided
- 4 clean copies provided

Revised to include details pertaining to each waste rock site and Volumes 8-10

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Volume 1, Table of Contents:

Replace entire section:

- 1 redline copy provided
- 4 clean copies provided

Revised to include details pertaining to Volumes 8-10

Cottonwood Mine: Volume 10 Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027, Previously referred to as "Cottonwood Coal Mine Waste Rock Storage Facility"

Replace Binder:

- Please remove environmental resource data from book entitled "Cottonwood Coal Mine Waste Rock Storage Facility" to new binder entitled, Cottonwood Mine: Volume 10 Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027
- 4 new binders provided

Deficiencies listed in letter dated April 18, 2000 "Findings for Reclamation Plan, AM00B":

Deficiency **R645-301-220, On page 34 of Part 4, clarify the location of the information for the New Waste Rock Site UTU-65027**

Response: As discussed earlier, Cottonwood Mine has two permitted waste rock facilities referred to as BLM right-of-ways UTU-37642 (Old Waste Rock Site) and UTU-65027 (New Waste Rock Site). Environmental Resource Data for:

UTU-37642 (Old Waste Rock Site): is located in the Appendices Volume: Appendix VII (Revised and submitted on January 11, 2000, no correspondence from the Division has been received on this amendment)

UTU-65027 (New Waste Rock Site): Environmental data pertaining to right-of-way UTU-65027 was originally submitted in 1989 as a separate Volume entitled "Cottonwood Coal Mine Waste Rock Storage Facility". To clarify the location of environmental resource data pertaining to this right-of-way, Energy West has revised the Introduction Section, Table of Contents and enclosed a new binder labeled as Cottonwood Mine: Volume 10 Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027.

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Deficiency **R645-301-143, Indicate the location of the soil sampling information referred on page 21, Item #7 of Part 4**

Response: *Energy West Mining in conjunction with Mt. Nebo Scientific has been monitoring fill slope interim revegetation annually (see Annual Vegetation Reports). Currently, Energy West is in the process of collecting soil samples on the five fill slopes (data will be submitted for inclusion in Part 4 Appendix D.) Fill slope soil sample sites for the five year intervals of 1993 and 1998 were not sampled.*

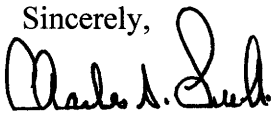
Deficiency **R645-830-140, The Permittee must give the Division detailed earthwork calculations. Those calculations must show the cut and fill quantities and the supporting information. The Permittee must give detailed material balance information that included the areas where material will be cut and sent for fill.**

Response: *Detailed information concerning cut/fill quantities and haul distances is located in Appendices Volume: Appendix IV. Energy West Mining hereby requests a sixty (60) day extension to revise and rectify discrepancies between the cut/fill quantities from Appendix IV to the Bond Estimation Summary located in Part 4 Reclamation Plan Appendix C.*

Unless an unforeseen item has been neglected, all parameters necessary to this amendment have been covered and are complete. One copy (including binder: Cottonwood Mine: Volume 10, Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027) has been sent to the Price Field Office.

If you have any questions or concerns regarding this amendment, please feel free to contact me at 687-4720.

Sincerely,



Charles A. Semborski
Geology/Environmental Supervisor

cc Carl Pollastro
 Blake Webster, Interwest Mining
 File

APPLICATION FOR PERMIT PROCESSING

Permit Change ☒New Permit ☐Renewal ☐Transfer ☐Exploration ☐Bond Release ☐

Permit Number: ACT/015/019

Title of Proposal: Revise the Introduction Section (includes Table of Contents) and replace Cottonwood Mine Waste Rock Storage Facility binder with Cottonwood Mine: Volume 10 Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027

Mine: COTTONWOOD/ WILBERG

Permittee: PACIFICORP

Description, include reason for application and timing required to implement: Revise Volume 1: Introduction Section (including Table of Contents) to include clarify location of environmental resource data for Waste Rock Sites and replace Cottonwood Mine Waste Rock Storage Facility binder with Cottonwood Mine: Volume 10 Waste Rock Site, Bureau of Land Management Right-of-Way UTU-65027

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

☐ Yes ☒ No 1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres ☐ increase ☐ decrease.

☐ Yes ☒ No 2. Is the application submitted as a result of a Division Order? DO # _____

☐ Yes ☒ No 3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?

☐ Yes ☒ No 4. Does application include operations in hydrologic basins other than as currently approved?

☐ Yes ☒ No 5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?

☐ Yes ☒ No 6. Does the application require or include public notice/publication?

☐ Yes ☒ No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?

☐ Yes ☒ No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?

☐ Yes ☒ No 9. Is the application submitted as a result of a Violation? NOV # _____

☐ Yes ☒ No 10. Is the application submitted as a result of other laws or regulations or policies? Explain: _____

☐ Yes ☒ No 11. Does the application affect the surface landowner or change the post mining land use?

☐ Yes ☒ No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)

☐ Yes ☒ No 13. Does the application require or include collection and reporting of any baseline information?

☐ Yes ☒ No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?

☐ Yes ☒ No 15. Does application require or include soil removal, storage or placement?

☐ Yes ☒ No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?

☐ Yes ☒ No 17. Does the application require or include construction, modification, or removal of surface facilities?

☐ Yes ☒ No 18. Does the application require or include water monitoring, sediment or drainage control measures?

☐ Yes ☒ No 19. Does the application require or include certified designs, maps, or calculations?

☐ Yes ☒ No 20. Does the application require or include subsidence control or monitoring?

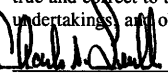
☐ Yes ☒ No 21. Have reclamation costs for bonding been provided for?

☐ Yes ☒ No 22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?

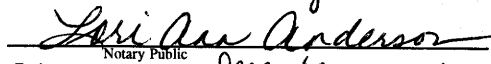
☐ Yes ☒ No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

☒ Attach 4 complete copies of the application.

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein. (R645-301-123)

 Charles A. Semborski - Geology/Permitting Supervisor Signed - Name - Position - Date 5/30/2000

Subscribed and sworn to before me this 30th day of May, 2000.


Notary Public
My Commission Expires: December 22, 2001
Attest: STATE OF Utah
COUNTY OF Emery

} ss:

Received by Oil, Gas & Mining

ASSIGNED TRACKING NUMBER

Detailed Schedule of Changes to the MRP

Permittee: PACIFICORP

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. Include page, section and drawing numbers as part of the description.

[illegible]

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?